

Federal Defenders
OF NEW YORK, INC.

Southern District
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By ECF and Email

Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Gilbert Ortiz
24 Cr. 602 (RMB)**

March 31, 2025

**Extensions granted.
Conference/ruling on motion(s)
is rescheduled to
June 17, 2025 at 10:00am.
Time is excluded pursuant to
the Speedy Trial Act to the
trial date of 9/8/25.**

SO ORDERED:

Date:

4/1/25

Richard M. Berman

Richard M. Berman, U.S.D.J.

Dear Judge Berman,

I write to respectfully request that the Court modify the motion schedule in the above-captioned case by allowing the defense two additional weeks to file its motion. This would modify the Court's briefing schedule to: Defense motion by 4/11/25 (originally 3/28); Government response by 5/8/25 (originally 4/24); Defense reply by 5/23/25 (originally 5/9); conference/ruling on the motion 6/10/25 (originally 5/27), or as convenient with the Court. The 9/8/25 trial date can remain the same. This late request was necessitated by a scheduling error on my part and underestimation of time required to incorporate the voluminous video discovery into my statement of facts.

The government, by Assistant United States Attorney Getzel Berger, consents to this application.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act through 9/8/25.

Thank you for your consideration.

Respectfully submitted,

/s/

Michael Rooney
Counsel for Mr. Ortiz

